

# GIBSON, DUNN & CRUTCHER LLP

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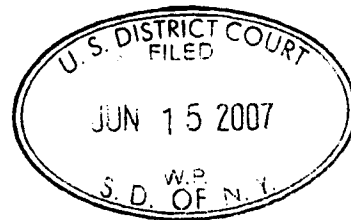
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June 11, 2007



Client No.  
P 88497-00016

## MEMO ENDORSED

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VIA FIRST CLASS MAIL

Honorable Mark Fox  
United States Magistrate Judge  
United States District Court, Southern District of New York  
300 Quarropas Street  
White Plains, NY 10601

Re: *Shaw Family Archives, Ltd., et al. v. CMG Worldwide, Inc., et al., CMG Worldwide, Inc., et al. v. Bradford Licensing Assocs., Docket No. 05-cv-3939*

Dear Judge Fox:

In accordance with the telephonic status conference held before Your Honor on May 29, 2007, we respectfully submit this letter on behalf of all parties to provide this Court with an agreed-upon case management plan to govern this action. As we discussed with Your Honor during the May 29th call, the parties have agreed to extend the discovery cut-off deadline to November 30, 2007, six months from now. In accordance with that agreement, we submit the following proposed new deadlines:

August 1, 2007 -- last day to amend the pleadings (but not to add additional parties)

October 16, 2007 -- expert disclosures and reports due

November 9, 2007 -- rebuttal expert disclosures and reports due

November 30, 2007 -- close of all fact and expert discovery

January 15, 2008 -- joint pre-trial order due.

MARK D. FOX  
United States Magistrate Judge  
Southern District of New York

*[Handwritten signature]*

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We thank the Court for its kind consideration of this request.

Respectfully,

 MMC  
Orin Snyder

CSA/ks

cc: Christopher Serbagi  
Jonathan Polak

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